

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS**

**TED CHANDLER AND  
MARTHA CHANDLER**

**PLAINTIFFS**

**VS.**

**NO. 4:14-CV-475 KGB**

**TRANSGUARD INSURANCE COMPANY**

**DEFENDANT**

**MOTION TO DEPOSIT FUNDS**

Come the Plaintiffs, Ted Chandler and Martha Chandler, by their attorneys, Ogles Law Firm, P.A. and Gilliam Law Firm, LLC, and for their motion, state:

1. That on June 8, 2014, Plaintiffs settled their case for \$375,000.00.
2. That after attorney's fees and expenses there remains \$188,362.23 in Plaintiffs' attorney's trust account.
3. That on July 11, 2014, Plaintiffs filed their Declaratory Judgment action.
4. That on October 7, 2014 Defendant's attorney sent Plaintiffs' attorney the attached letter. See Exhibit A.
5. That the attached letter is an attempt to extort, blackmail, and defraud Plaintiffs and their attorney.
6. Defendant's attorney is going to file suit against Plaintiffs' attorney unless some resolution can be made.
7. That the purpose of the declaratory judgment is for the Court to decide who should receive the settlement funds. The declaratory action is self-explanatory.
8. Plaintiffs request that they be allowed to deposit the settlement funds in the registry of the Court.

WHEREFORE, Plaintiffs, Ted Chandler and Martha Chandler, request this Court allow them to deposit the remaining settlement funds into the registry of the Court, and for all other proper relief.

Respectfully submitted,

Vicki L. Gilliam  
The Gilliam Firm, PLLC  
Arkansas Bar No. 2002045  
P.O. Box 1303  
Clinton, MS 39060  
601-488-4044  
Facsimile 601-488-4043  
[gilliam@gilliamfirm.com](mailto:gilliam@gilliamfirm.com)

/s/John Ogles

---

John Ogles  
Arkansas Bar No. 89003  
Texas Bar No. 00797922  
OGLES LAW FIRM, P.A.  
200 S. Jeff Davis  
P.O. Box 891  
Jacksonville, AR 72078  
(501) 982-8339  
[jogles@aol.com](mailto:jogles@aol.com)

CERTIFICATE OF SERVICE

I hereby certify that on the 9<sup>th</sup> day of October, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, and I hereby certify that a copy of the above and foregoing will be sent via email to:

Rick Sellars  
Bailey, Trimble, Lowe, Sellars & Thomas  
2102 Riverfront St., Suite 100  
Little Rock, AR 72202  
Fax: 663-5767  
email: [rsellarspa@sbcglobal.net](mailto:rsellarspa@sbcglobal.net)

/s/ John Ogles  
\_\_\_\_\_  
John Ogles

BAILEY, TRIMBLE, LOWE, SELLARS & THOMAS

2102 RIVERFRONT DRIVE, SUITE 100

LITTLE ROCK, ARKANSAS 72202

R. EUGENE BAILEY (1920-1985)

WALLS TRIMBLE, P.A.

CHESTER C. LOWE, JR., P.A.

RICK SELLARS, P.A.

PETER O. THOMAS, JR., P.A.

TELEPHONE (501) 663-4444

FACSIMILE (501) 663-5767

Writer's Direct E-Mail:  
rsellarspa@sbcglobal.net

October 7, 2014

John Ogles  
Ogles Law Firm, P.A.  
200 S. Jeff Davis  
Jacksonville, AR 72078

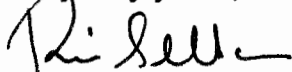
Re: TransGuard matter

Dear Mr. Ogles:

I enclose motion to file third party complaint, brief in support, proposed Third Party Complaint and various support documents referred to in the proposed Third Party Complaint.

Before filing any of this, my client has stated that they still would prefer resolution without having to file the Third Party Complaint. Accordingly, I am sending these to you before filing them to see if any settlement resolution is possible.

Very truly yours,



Rick Sellars

Enc